



July 14, 2017

**Request for Review**

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CC Docket No. 02-06, 13-184 and 96-45

To Whom It May Concern:

The Redding School District respectfully requests a reconsideration of the amounts committed to two Funding Request Numbers on the Funding Commitment Decision Letter issued on 8/12/2016 (see attached document "[FCC Form 471 - 161031573 - REDDING SCHOOL DISTRICT FCDL.xlsx](#)") for the following FCC Form 471 and its respective FRNs:

Appellant/Organization Name	Redding School District
Billed Entity Number	144783
FCC Form 471 Number	161031573
Funding Request Numbers:	1699065357, 1699065296

A USAC Appeal for this request was filed on October 25, 2016. A Revised Funding Commitment Decision Letter was issued by USAC on May 20, 2017 which denied the appeal (see attached document "[Redding SD Y19 USAC - Letter of Appeal and RFCDL.pdf](#)") which contains both the USAC appeal and RFCDL that was issued). While the 60-Day USAC appeal deadline was missed by Redding School District by a mere 13 days, USAC did not issue a decision for 7 months.

Redding School District provides E-rate filing assistance to two small school districts that also reside in Shasta County – Igo-Ono-Platina Elementary School District and Shasta Union Elementary School District. During Funding Year 2016, Redding School District assisted in filing the E-rate Form 471 applications for all three Districts.

During the 471 application preparation, a ministerial and clerical error was made when inputting the costs and quantities for the Local Voice and Cellular FRNs on 471# 161031573.

The documentation for Shasta Union Elementary School District was inadvertently used when inputting the costs and quantities for FRN 1699065357. The quantities and costs for Shasta Union Elementary School District's cellular services are considerably less than that of Redding School District as Shasta Union Elementary School District is a one-site School District and Redding School District consists of eight schools. As such, this error resulted in a substantial loss of funding for the Redding School District.

To support the Ministerial and Clerical error that was made during the application preparation process for FRN 1699065357, please see the attached document "[Shasta UESD Verizon Wireless Invoice.pdf](#)". This is the source document that was inadvertently used when entering costs and quantities for Redding School District's cellular services into the Form 471 application. The Account Name on the invoice reads "Redding Elementary School District", however, this invoice in fact, is Shasta Union Elementary School District's invoice, NOT Redding School

Districts. The incorrect account name on the invoice was due to the fact that the invoices for Redding School District and Shasta Union Elementary are mailed to the same address because the contact person for both schools operates out of one location. The source documentation that should have been used for Redding School District's costs for FRN 1699065357 is the attached document titled "[Redding SD Verizon Wireless Invoice.pdf](#)".

We respectfully ask that the Funding Request for FRN 1699065357 be adjusted to the following true eligible costs for Redding School District's cellular services:

FRN 1699065357:

Monthly Cost	\$2,350.03
Unit Cost	\$9.41
Ineligible Unit Costs	\$26.20
Ineligible Monthly cost	\$1729.20
Eligible Monthly Costs	\$620.83
Monthly Quantity	66
Total Eligible MRC	\$621.06
Months of Service	12
Total Eligible Recurring Cost	\$7,452.72

To support the Ministerial and Clerical error that was made during the application preparation process for FRN 1699065296, please see the screenshots below showing the source documentation used to calculate the monthly recurring costs.

As shown in the screenshot below of Redding School District's AT&T Online Billing Consolidator account, Redding School District has nine account numbers with AT&T for its Local Voice under FRN 1699065357. The AT&T Billing Consolidator was the source documentation used to calculate the costs for FRN 1699065357 on 471# 161031573. Based on the October 2016 costs in Redding School District's AT&T Billing Consolidator Account, the actual total monthly recurring charges for all nine accounts far exceeds what was applied for on 471# 161031573. This is because, due to a Ministerial and Clerical error, one of the account numbers was not included in the calculations when determining the monthly recurring costs on FRN 1699065357 on 471# 1699065357. Please reference the screenshots below which show the correct number of Billing Account Numbers under Redding School District as well as the monthly recurring charges for each billing account number to support the true total monthly recurring cost for Redding School District FRN 1699065296.

List of all Billing Account Numbers under Redding School District's AT&T Local Voice and Long Distance Services:



## AT&T Billing Consolidator

Users Reports Maintenance User Help

### Bill Payer Search

- ☒ BAN  
☐ Bill Payer Name  
☐ BTN Display  
☐ Invoice  
☐ Attention Name  
☐ Customer Name

Find Results - 9 records found

1			
BAN	Customer Name	Bill Payer Name	Attention Name
<a href="#">9391001179</a>	REDDING ELEMENTARY SCHOOL DISTRICT	Redding School District	
<a href="#">9391001180</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING ELEMENTARY SCHOOL DIST	
<a href="#">9391001181</a>	REDDING ELEMENTARY SCHOOL DISTRICT	MONARCH LEARNING CENTER	MONARCH CHARTER SCHL
<a href="#">9391007549</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING SCHOOL DISTRICT	
<a href="#">9391007550</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING ELEMENTARY SCHOOL DIST	
<a href="#">9391007551</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING ELEMENTARY SCHOOL DIST	
<a href="#">9391007552</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING ELEMENTARY SCHOOL DIST	
<a href="#">9391007553</a>	REDDING ELEMENTARY SCHOOL DISTRICT	Redding Elementary SD - YMCA	
<a href="#">9391036281</a>	REDDING ELEMENTARY SCHOOL DISTRICT	REDDING ELEMENTARY SCHL DIST	ELEM SCHL DIST-ACCTG

The Monthly Recurring Costs associated with each Billing Account Number:

Bill Payer(BAN):

Last Invoice: 05-03-2017 Bill Round: 3 Customer ID: 34701545

#### Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$61.85	\$0.00	\$0.00	\$23.68 cr	\$38.17		\$0.00

#### History of Account Summary

1 2 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">05-03-2017</a>	0009632632	\$38.17	\$23.68	\$61.85	\$0.00	\$0.00
2	<a href="#">04-03-2017</a>	0009479696	\$37.89	\$13.63	\$23.68	\$13.63 cr	\$14.21 cr
3	<a href="#">03-03-2017</a>	0009360000	\$37.96	\$10.11 cr	\$13.63	\$0.00	\$14.22 cr
4	<a href="#">02-03-2017</a>	0009207568	\$38.02	\$33.86 cr	\$10.11 cr	\$0.00	\$14.27 cr
5	<a href="#">01-03-2017</a>	0009093522	\$38.03	\$38.16	\$33.86 cr	\$38.16 cr	\$71.89 cr
6	<a href="#">12-03-2016</a>	0008936680	\$38.16	\$38.23	\$38.16	\$38.23 cr	\$0.00
7	<a href="#">11-03-2016</a>	0008817271	\$38.23	\$67.60	\$38.23	\$67.60 cr	\$0.00
8	<a href="#">10-03-2016</a>	0008682870	\$38.36	\$29.62	\$67.60	\$0.00	\$0.38 cr
9	<a href="#">09-03-2016</a>	0008549390	\$40.07	\$16.56	\$29.62	\$16.56 cr	\$10.45 cr
10	<a href="#">08-03-2016</a>	0008415200	\$37.40	\$16.27	\$16.56	\$16.27 cr	\$20.84 cr
11	<a href="#">07-03-2016</a>	0008285262	\$37.08	\$11.51	\$16.27	\$11.51 cr	\$20.81 cr
12	<a href="#">06-03-2016</a>	0008153945	\$37.22	\$4.90 cr	\$11.51	\$0.00	\$20.81 cr

Bill Payer(BAN):  ×  ▾

Last Invoice: 05-03-2017 Bill Round: 3 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$29.94	\$0.00	\$0.00	\$11.15 cr	\$18.79		\$0.00

History of Account Summary

1 <u>2</u> 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">05-03-2017</a>	0009632633	\$19.76	\$11.15	\$29.94	\$0.00	\$0.97 cr
2	<a href="#">04-03-2017</a>	0009479697	\$19.66	\$2.83	\$11.15	\$2.83 cr	\$8.51 cr
3	<a href="#">03-03-2017</a>	0009360001	\$19.66	\$8.34 cr	\$2.83	\$0.00	\$8.49 cr
4	<a href="#">02-03-2017</a>	0009207569	\$19.62	\$19.42 cr	\$8.34 cr	\$0.00	\$8.54 cr
5	<a href="#">01-03-2017</a>	0009093523	\$19.70	\$18.77	\$19.42 cr	\$18.77 cr	\$39.12 cr
6	<a href="#">12-03-2016</a>	0008936681	\$19.75	\$18.81	\$18.77	\$18.81 cr	\$0.98 cr
7	<a href="#">11-03-2016</a>	0008817272	\$19.79	\$33.13	\$18.81	\$33.13 cr	\$0.98 cr
8	<a href="#">10-03-2016</a>	0008682871	\$19.82	\$14.48	\$33.13	\$0.00	\$1.17 cr
9	<a href="#">09-03-2016</a>	0008549391	\$20.67	\$7.08	\$14.48	\$7.08 cr	\$6.19 cr
10	<a href="#">08-03-2016</a>	0008415201	\$19.36	\$6.04	\$7.08	\$6.04 cr	\$12.28 cr
11	<a href="#">07-03-2016</a>	0008285263	\$19.18	\$0.86 cr	\$6.04	\$0.00	\$12.28 cr
12	<a href="#">06-03-2016</a>	0008153946	\$19.26	\$7.85 cr	\$0.86 cr	\$0.00	\$12.27 cr

Bill Payer(BAN):  ×  ▾

Last Invoice: 05-11-2017 Bill Round: 11 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$94.40	\$0.00	\$0.00	\$0.00	\$94.40		\$0.00

History of Account Summary

1 <u>2</u> 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">05-11-2017</a>	0009660839	\$105.47	\$72.36	\$94.40	\$72.36 cr	\$11.07 cr
2	<a href="#">04-11-2017</a>	0009527174	\$105.49	\$56.82	\$72.36	\$56.82 cr	\$33.13 cr
3	<a href="#">03-11-2017</a>	0009391004	\$105.05	\$19.04 cr	\$56.82	\$0.00	\$29.19 cr
4	<a href="#">02-11-2017</a>	0009252081	\$105.84	\$171.45	\$19.04 cr	\$267.37 cr	\$28.96 cr
5	<a href="#">01-11-2017</a>	0009116576	\$104.86	\$95.92	\$171.45	\$0.00	\$29.33 cr
6	<a href="#">12-11-2016</a>	0008983966	\$106.60	\$106.59	\$95.92	\$0.00	\$117.27 cr
7	<a href="#">11-11-2016</a>	0008845823	\$106.59	\$107.17	\$106.59	\$107.17 cr	\$0.00
8	<a href="#">10-11-2016</a>	0008714400	\$107.17	\$84.62	\$107.17	\$84.62 cr	\$0.00
9	<a href="#">09-11-2016</a>	0008576990	\$106.43	\$63.53	\$84.62	\$63.53 cr	\$21.81 cr
10	<a href="#">08-11-2016</a>	0008444358	\$105.93	\$59.86	\$63.53	\$59.86 cr	\$42.40 cr
11	<a href="#">07-11-2016</a>	0008312442	\$104.06	\$63.86	\$59.86	\$63.86 cr	\$44.20 cr
12	<a href="#">06-11-2016</a>	0008181345	\$106.99	\$60.33	\$63.86	\$60.33 cr	\$43.13 cr

Bill Payer(BAN):  ×  ▾

Last Invoice: 05-10-2017 Bill Round: 10 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$264.29	\$0.00	\$0.00	\$100.05 cr	\$164.24		\$0.00

History of Account Summary

1 <u>2</u> 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">05-10-2017</a>	0009657017	\$164.24	\$100.05	\$264.29	\$0.00	\$0.00
2	<a href="#">04-10-2017</a>	0009520563	\$164.24	\$40.32	\$100.05	\$40.32 cr	\$64.19 cr
3	<a href="#">03-10-2017</a>	0009387198	\$164.24	\$59.73 cr	\$40.32	\$0.00	\$64.19 cr
4	<a href="#">02-10-2017</a>	0009248316	\$164.24	\$159.82 cr	\$59.73 cr	\$0.00	\$64.15 cr
5	<a href="#">01-10-2017</a>	0009114502	\$164.13	\$164.83	\$159.82 cr	\$164.83 cr	\$323.95 cr
6	<a href="#">12-10-2016</a>	0008980234	\$164.83	\$165.95	\$164.83	\$165.95 cr	\$0.00
7	<a href="#">11-10-2016</a>	0008837686	\$165.95	\$165.95	\$165.95	\$165.95 cr	\$0.00
8	<a href="#">10-10-2016</a>	0008712464	\$165.95	\$165.95	\$165.95	\$165.95 cr	\$0.00
9	<a href="#">09-10-2016</a>	0008573423	\$165.95	\$68.64	\$165.95	\$68.64 cr	\$0.00
10	<a href="#">08-10-2016</a>	0008442521	\$165.95	\$68.64	\$68.64	\$68.64 cr	\$97.31 cr
11	<a href="#">07-10-2016</a>	0008309009	\$165.95	\$104.74	\$68.64	\$104.74 cr	\$97.31 cr
12	<a href="#">06-10-2016</a>	0008173742	\$165.95	\$104.74	\$104.74	\$68.64 cr	\$97.31 cr

Bill Payer(BAN):  ×  ▾

Last Invoice: 04-19-2017 Bill Round: 19 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$23.30	\$26.55	\$0.00	\$116.34 cr	\$66.49 cr		\$0.00

History of Account Summary

1 <u>2</u> 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">04-19-2017</a>	0009568621	\$23.30	\$18.00	\$23.30	\$18.00 cr	\$0.00
2	<a href="#">03-19-2017</a>	0009432378	\$32.21	\$14.21 cr	\$18.00	\$0.00	\$0.00
3	<a href="#">02-19-2017</a>	0009296190	\$14.49	\$28.70 cr	\$14.21 cr	\$0.00	\$0.00
4	<a href="#">01-19-2017</a>	0009160586	\$21.48	\$50.18 cr	\$28.70 cr	\$0.00	\$0.00
5	<a href="#">12-19-2016</a>	0009025509	\$30.50	\$80.68 cr	\$50.18 cr	\$0.00	\$0.00
6	<a href="#">11-19-2016</a>	0008889646	\$34.02	\$77.80 cr	\$80.68 cr	\$36.90 cr	\$0.00
7	<a href="#">10-19-2016</a>	0008749829	\$33.59	\$111.39 cr	\$77.80 cr	\$0.00	\$0.00
8	<a href="#">09-19-2016</a>	0008620167	\$9.09	\$21.98 cr	\$111.39 cr	\$0.00	\$98.50 cr
9	<a href="#">08-19-2016</a>	0008487278	\$3.25	\$25.07	\$21.98 cr	\$25.07 cr	\$25.23 cr
10	<a href="#">07-19-2016</a>	0008355128	\$25.07	\$33.72	\$25.07	\$33.72 cr	\$0.00
11	<a href="#">06-19-2016</a>	0008223785	\$33.72	\$21.23	\$33.72	\$21.23 cr	\$0.00
12	<a href="#">05-19-2016</a>	0008092747	\$21.23	\$25.44	\$21.23	\$25.44 cr	\$0.00

Bill Payer(BAN):  ×  ▾

Last Invoice: 04-19-2017 Bill Round: 19 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$243.20	\$0.00	\$0.00	\$243.20 cr	\$0.00		\$0.00

History of Account Summary

1 2 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">04-19-2017</a>	0009568622	\$368.66	\$242.45	\$243.20	\$242.45 cr	\$125.46 cr
2	<a href="#">03-19-2017</a>	0009432379	\$367.91	\$242.45	\$242.45	\$242.45 cr	\$125.46 cr
3	<a href="#">02-19-2017</a>	0009296191	\$367.91	\$139.48	\$242.45	\$139.48 cr	\$125.46 cr
4	<a href="#">01-19-2017</a>	0009160587	\$367.76	\$102.52 cr	\$139.48	\$0.00	\$125.76 cr
5	<a href="#">12-19-2016</a>	0009025510	\$368.33	\$328.95	\$102.52 cr	\$328.95 cr	\$470.85 cr
6	<a href="#">11-19-2016</a>	0008889647	\$369.33	\$330.82	\$328.95	\$330.82 cr	\$40.38 cr
7	<a href="#">10-19-2016</a>	0008749830	\$371.20	\$331.27	\$330.82	\$331.27 cr	\$40.38 cr
8	<a href="#">09-19-2016</a>	0008620168	\$371.65	\$331.72	\$331.27	\$331.72 cr	\$40.38 cr
9	<a href="#">08-19-2016</a>	0008487279	\$372.10	\$206.77	\$331.72	\$206.77 cr	\$40.38 cr
10	<a href="#">07-19-2016</a>	0008355129	\$371.20	\$206.62	\$206.77	\$206.62 cr	\$164.43 cr
11	<a href="#">06-19-2016</a>	0008223786	\$371.05	\$206.62	\$206.62	\$206.62 cr	\$164.43 cr
12	<a href="#">05-19-2016</a>	0008092748	\$371.05	\$206.47	\$206.62	\$206.47 cr	\$164.43 cr

Bill Payer(BAN):  ▾  ▾

Last Invoice: 04-19-2017 Bill Round: 19 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$25.16	\$0.00	\$0.00	\$25.16 cr	\$0.00		\$0.00

History of Account Summary

1 2 3							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">04-19-2017</a>	0009568623	\$38.04	\$25.02	\$25.16	\$25.02 cr	\$12.88 cr
2	<a href="#">03-19-2017</a>	0009432380	\$37.90	\$25.02	\$25.02	\$25.02 cr	\$12.88 cr
3	<a href="#">02-19-2017</a>	0009296192	\$37.90	\$6.22	\$25.02	\$6.22 cr	\$12.88 cr
4	<a href="#">01-19-2017</a>	0009160588	\$37.88	\$18.72 cr	\$6.22	\$0.00	\$12.94 cr
5	<a href="#">12-19-2016</a>	0009025511	\$38.01	\$36.02	\$18.72 cr	\$36.02 cr	\$56.73 cr
6	<a href="#">11-19-2016</a>	0008889648	\$38.10	\$36.17	\$36.02	\$36.17 cr	\$2.08 cr
7	<a href="#">10-19-2016</a>	0008749831	\$38.25	\$27.93	\$36.17	\$27.93 cr	\$2.08 cr
8	<a href="#">09-19-2016</a>	0008620169	\$38.29	\$35.26	\$27.93	\$35.26 cr	\$10.36 cr
9	<a href="#">08-19-2016</a>	0008487280	\$39.49	\$18.75	\$35.26	\$18.75 cr	\$4.23 cr
10	<a href="#">07-19-2016</a>	0008355130	\$37.25	\$18.69	\$18.75	\$18.69 cr	\$18.50 cr
11	<a href="#">06-19-2016</a>	0008223787	\$37.19	\$18.69	\$18.69	\$18.69 cr	\$18.50 cr
12	<a href="#">05-19-2016</a>	0008092749	\$37.19	\$18.67	\$18.69	\$18.67 cr	\$18.50 cr

Bill Payer(BAN):  ×  ▾

Last Invoice: 04-17-2017 Bill Round: 17 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$0.46 cr	\$0.00	\$0.00	\$0.00	\$0.46 cr		\$0.00

History of Account Summary

1 <u>2</u> <u>3</u>							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">04-17-2017</a>	0009564497	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
2	<a href="#">03-17-2017</a>	0009428417	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
3	<a href="#">02-17-2017</a>	0009292072	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
4	<a href="#">01-17-2017</a>	0009156497	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
5	<a href="#">12-17-2016</a>	0009021184	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
6	<a href="#">11-17-2016</a>	0008885664	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
7	<a href="#">10-17-2016</a>	0008748212	\$0.00	\$0.46 cr	\$0.46 cr	\$0.00	\$0.00
8	<a href="#">09-17-2016</a>	0008616257	\$0.00	\$0.00	\$0.46 cr	\$0.00	\$0.46 cr
9	<a href="#">08-17-2016</a>	0008483425	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
10	<a href="#">07-17-2016</a>	0008351265	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
11	<a href="#">06-17-2016</a>	0008219942	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
12	<a href="#">05-17-2016</a>	0008088936	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Bill Payer(BAN):  ×  ▾

Last Invoice: 04-19-2017 Bill Round: 19 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$2,613.06	\$1.20	\$0.00	\$2,613.06 cr	\$1.20		\$0.00

History of Account Summary

1 <u>2</u>							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	<a href="#">04-19-2017</a>	0009569335	\$2,714.90	\$5,128.62	\$2,613.06	\$5,128.62 cr	\$101.84 cr
2	<a href="#">03-19-2017</a>	0009433092	\$2,688.36	\$5,137.93	\$5,128.62	\$2,595.83 cr	\$101.84 cr
3	<a href="#">02-19-2017</a>	0009296904	\$2,697.67	\$2,542.10	\$5,137.93	\$0.00	\$101.84 cr
4	<a href="#">01-19-2017</a>	0009161300	\$2,643.94	\$2,554.51	\$2,542.10	\$2,554.51 cr	\$101.84 cr
5	<a href="#">12-19-2016</a>	0009026223	\$2,656.35	\$2,617.86	\$2,554.51	\$2,617.86 cr	\$101.84 cr
6	<a href="#">11-19-2016</a>	0008890360	\$2,719.70	\$2,608.31	\$2,617.86	\$2,608.31 cr	\$101.84 cr
7	<a href="#">10-19-2016</a>	0008750544	\$2,710.15	\$2,599.52	\$2,608.31	\$2,599.52 cr	\$101.84 cr
8	<a href="#">09-19-2016</a>	0008620882	\$2,701.36	\$2,601.13	\$2,599.52	\$2,601.13 cr	\$101.84 cr
9	<a href="#">08-19-2016</a>	0008487993	\$2,702.97	\$2,351.42	\$2,601.13	\$2,351.42 cr	\$101.84 cr
10	<a href="#">07-19-2016</a>	0008355843	\$2,503.42	\$2,488.47	\$2,351.42	\$2,488.47 cr	\$152.00 cr
11	<a href="#">06-19-2016</a>	0008224500	\$2,640.47	\$2,486.56	\$2,488.47	\$2,486.56 cr	\$152.00 cr
12	<a href="#">05-19-2016</a>	0008093462	\$2,636.84	\$2,412.86	\$2,486.56	\$2,412.86 cr	\$150.28 cr



We respectfully ask that the Funding Request for FRN 1699065296 be adjusted to the following true eligible costs for Redding School District's Local Voice services:

FRN 1699065296:

Monthly Cost	\$3,449.43
Unit Cost	\$15.31
Ineligible Unit Costs	\$0.73
Ineligible Monthly cost	\$157.93
Eligible Monthly Costs	\$3,291.50
Monthly Quantity	215
Total Eligible MRC	\$3,291.65
Months of Service	12
Total Eligible Recurring Cost	\$39,499.80

As part of the E-rate application process, Form 471 applications typically undergo a Program Integrity Assurance Review process prior to issuance of a Funding Commitment Decision Letter, during which time the applicant has an opportunity to review specific areas of the application and an opportunity to submit corrections needed to be made directly to a USAC PIA reviewer. Redding School District's 471# 161031573 did undergo such a review, however, neither of the Funding Request Numbers in question (FRN 1699065357, FRN 1699065296) were included as part of the review process and, therefore, Redding was not afforded this additional opportunity to identify the Ministerial and Clerical errors associated with these FRNs and as a result, the errors were not discovered until after the FCDL was issued and preparation for invoicing began. Form 471# 161043640 (containing FRNs 1699096854, 1699096860, 1699096894, 1699096904, and 1699096914) for Shasta Union Elementary School District did not undergo PIA review at all. An FCDL was issued directly with no PIA outreach and, therefore, there was also no opportunity for correlating information between Redding School District's and Shasta Union Elementary School District's applications to be reviewed.

As indicated on the Universal Service Administration Co. website under the Competitive Bidding section of the Applicant Process, the Schools and Libraries Division defines a Ministerial and Clerical error as "data entry errors or mistakes applicants made on the FCC Form 470 or FCC Form 471." The SLD goes on to state that "Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application or making an arithmetic error". The Ministerial and Clerical Errors outlined in this appeal occurred as a result of "Failing to enter an item from the source list" and therefore fall within the Allowable FCC Form 471 corrections as shown in the screenshot below from the Schools and Libraries web page:



## STEP 1 COMPETITIVE BIDDING

STEP 2 ▶

FCC Form 470 Filing	Open & Fair Process	28-Day Waiting Period
Letters of Agency (LOAs)	Free Services Advisory	Requirements for Fiber
<u>Ministerial &amp; Clerical Errors</u>	Consultant Registration Numbers	

### Ministerial & Clerical Errors

Updated December 2015

Ministerial and clerical (M&C) errors are defined as data entry errors or mistakes applicants made on the FCC Form 470 or FCC Form 471. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. USAC can process requests to correct M&C errors until the time that a Funding Commitment Decision Letter (FCDL) is issued.

### Allowable & Non-Allowable Corrections

USAC can process allowable corrections to M&C errors, and the applicant does not need to file a new form. See below for examples of allowable corrections.

Applicants must file a new form to correct non-allowable corrections. See below for examples of non-allowable corrections. Remember that, if you must file a new form, your new form must still meet these program deadlines:

- A new FCC Form 470 must be posted for at least 28 days before the close of the filing window because the applicant must wait at least 28 days before closing its competitive bidding process, selecting the most cost-effective bid, signing a contract (if applicable), and signing and submitting an FCC Form 471.
- A new FCC Form 471 must be filed before the close of the application filing window to be considered as timely filed.

Some corrections do not need review by USAC. For those that do, USAC currently processes requests for allowable corrections to FCC Forms 470 through the E-rate Productivity Center (EPC). Allowable FCC Form 471 corrections are currently handled via email or mail, however, these corrections will be processed in EPC beginning with Funding Year 2016. In many cases, USAC can determine whether the correction is allowable and, if so, complete the correction without requesting additional information. However when the nature of the correction is not apparent, USAC may request the appropriate source documentation to determine whether the correction is allowable. Source documentation is the documentation containing the information used to prepare the form (e.g., contract, vendor quote, NSLP data, etc.).

You will be informed if your FCC Form 471 correction was allowable and if it was processed in your Funding Commitment Decision Letter (FCDL).

### Examples of Corrections

#### Allowable FCC Form 470 Corrections

- Editing the application nickname
- Add one or more FCC Form 470 RFP documents
- Change the main contact person
- Edit the technical contact person on the FCC Form 470

#### Allowable FCC Form 471 Corrections

- Spelling errors
- Simple addition, subtraction, multiplication or division errors
- Transposed letters and numbers
- Misplaced decimal points
- Other punctuation marks (hyphens, periods, commas, etc.) included or not included or misplaced
- Failing to enter an item from the source list (e.g., NSLP data, uploaded Block 4 data, FRN, etc.)
- Incorrect citations such as:

In addition to the guidance provided by USAC regarding Allowable FCC Form 471 Corrections, Redding School District would like to cite the Bishop-Perry Order released May 19, 2006 in which a waiver was granted for Ministerial and Clerical Errors and Minimum Processing Standards of Form 471 applications. The Order states:

We do not believe that such minor mistakes warrant the complete rejection of each of these applicants' E-rate applications, especially given the requirements of the program and the thousands of applications filed each year.<sup>32</sup> Importantly, applicants' errors could not have resulted in an advantage for them in the processing of their application. That is, the applicants' mistakes, if not caught by USAC, could not have resulted in the applicant receiving more funding than it was entitled to. In addition, at this time, there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements. Furthermore, we find that the denial of funding requests inflicts undue hardship on the applicants. In these cases, we find that the applicants have demonstrated that rigid compliance with the application procedures does not further the purposes of section 254(h) or serve the public interest.<sup>33</sup> We therefore grant these appeals and remand them to USAC for further processing consistent with this Order. that as well as the FCC 11-60A1 released April 14, 2011.

Similarly, the Ministerial and Clerical errors made by Redding School District on 471# 161031573 could not have resulted in an advantage for the district in the processing of their application, and the district did not fail to adhere to core program requirements when filing the FCC Form 471. The FCC has taken a stance in the understanding that minor mistakes should not warrant the rejection or unnecessary reduction of an E-rate application and as such, Redding School District feels that this minor Ministerial and Clerical error should not result in a loss of funds that would monetarily equate to an almost complete rejection of the FRNs in question.

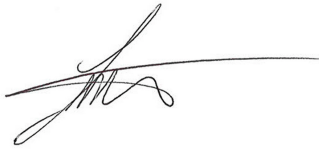
Additionally, FCC Order FCC-11-60A1 released April 11, 2011, extended the deadline for applicants under the E-rate program to submit corrections of clerical or ministerial errors on their FCC Form 470 and FCC Form 471 applications. The Order specifically states:

We now extend the deadline for the submission of clerical or ministerial corrections to USAC to permit such corrections to be made until USAC issues the FCDL for an applicant. In the Bishop Perry Order, the Commission gave applicants 15 calendar days to submit corrections of clerical or ministerial errors, or to refile their FCC Form 470 or FCC Form 471 application, or associated documentation. As we have now had significant experience with the process since the Bishop Perry Order was released, we conclude that a better approach would be to allow applicants a longer opportunity to correct truly ministerial and clerical errors. Thus, we direct USAC to allow an applicant to amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. Given the complexity and detail that is often involved in completing these forms and associated documentation, we recognize that such errors may not be discovered until significantly after a request for funding was filed. Currently, if applicants discover the error after the 15-day deadline, they have to file an appeal with the Commission to correct a ministerial or clerical error. Those types of appeals unnecessarily waste applicant and administrative resources, and we find it is in the public interest to allow applicants a greater amount of time to correct ministerial and clerical errors. We note, however, that USAC may request documentation or explanation from an applicant seeking to amend its forms to ensure that the changes requested are clerical or ministerial. We emphasize that the Commission's filing deadlines and procedural rules are necessary for the efficient administration of the E-rate program. Although applicants will now have a greater opportunity to correct clerical and ministerial errors during the application review process, applicants that make such errors will still face delays and uncertainty because USAC may need to confirm that such errors are truly clerical or ministerial. USAC shall use our precedents to guide its decisions on whether a modification is a ministerial or clerical error. Applicants that believe USAC has incorrectly rejected a clerical or ministerial correction may appeal that decision to the Commission.

The FCC specifically states within the order "Given the complexity and detail that is often involved in completing these forms and associated documentation, we recognize that such errors may not be discovered until significantly after a request for funding was filed." The E-rate program and filing procedure has become increasingly complex since the inception of the Second E-rate Modernization Order and the introduction of the EPC Portal in the 2016-2017 Funding Year. The FCC has been historically understanding of the complexity of the program and Redding School District hopes that the Commission will be understanding of this particular circumstance.

Due to Ministerial and Clerical Errors as outlined in the written explanation above and supported by the attached documents, the Funding Request amounts for FRNs 1699065357 and 1699065296 contained in 471# 1699065296 for Redding School District were incorrectly filed. Redding is respectfully requesting that the Total Pre-Discount Eligible Monthly Recurring Cost for FRN 1699065357 be revised to \$621.06 and the Total Pre-Discount Eligible Monthly Recurring Cost for FRN 1699065296 to be revised to \$3,291.65 as these are the true eligible monthly recurring costs for the associated services. As E-rate Program rules allow for corrections to 471 applications due to Ministerial and Clerical errors, and based on the FCC Orders outlined and referenced above, we are kindly asking for a review of the attached documents and written explanation and consideration to revise the Funding Request amounts.

Sincerely,  
Lehna Markarian  
Consultant, E-Rate Services  
CSM Consulting, Inc.  
3130-C Inland Empire Blvd.  
Ontario, CA 91764  
[Imarkarian@csmcentral.com](mailto:Imarkarian@csmcentral.com)

A handwritten signature in black ink, appearing to be 'Lehna Markarian', with a long horizontal line extending to the right.